

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANTONIO VENTURA, on behalf of himself and  
all other persons similarly situated,

Plaintiff,

-against-

GJUSHI CONSTRUCTION CO., LLC, ARJAN  
GJUSHI, and MICHAEL GJUSHI,

Defendants.

Case No. 1:21-cv-06662 (JMF) (OTW)

**NOTICE OF ACCEPTANCE OF  
OFFER OF JUDGMENT**

NOW COMES plaintiff Antonio “Miguel” Ventura, by and through his undersigned counsel, and hereby gives written notice of his acceptance of the Rule 68 Offer of Judgment of defendants Gjushi Construction Co., LLC, Arjan Gjushi, and Michael Gjushi (“Defendants”), as follows:

1. Plaintiff accepts defendants’ Offer of Judgment in the amount of \$62,500.00, inclusive of attorneys’ fees, costs, and prejudgment interest accrued to date. This amount will be paid mainly in a lump sum, along with six additional monthly payments, pursuant to the terms specified in the settlement agreement between the parties.
2. A copy of Defendants’ Rule 68 Offer of Judgment, which was served on Plaintiffs’ counsel, is attached hereto as Exhibit A.

WHEREFORE, Plaintiff requests:

That the Clerk of the Court enter a judgment in this matter against the defendants, Gjushi Construction Co., LLC, Arjan Gjushi, and Michael Gjushi, and for the plaintiff, in the amount of

\$62,500.00, inclusive of attorneys' fees, costs, and prejudgment interest accrued to date.

Dated: December 20, 2021

Respectfully submitted,

The Clerk of Court is directed to enter judgment in favor of Plaintiff, in accordance with the terms above, and close the case.

SO ORDERED.



/s/ Michael Samuel  
Michael Samuel (MS 7997)  
The Samuel Law Firm  
1441 Broadway – Suite 6085  
New York, NY 10018  
(212) 563-9884

*Attorneys for Plaintiff*

December 21, 2021

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANTONIO VENTURA, on behalf of himself and  
all other persons similarly situated,

Plaintiff,

-against-

GJUSHI CONSTRUCTION CO., LLC, ARJAN  
GJUSHI, and MICHAEL GJUSHI,

Defendants.

Case No. 1:21-cv-06662-JMF

**RULE 68 OFFER OF JUDGMENT**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, defendants Gjushi Construction Co., LLC, Arjan Gjushi, and Michael Gjushi (“Defendants”), hereby offer judgment to be entered against them in the total amount of \$62,500, which amount is inclusive of all costs, attorneys’ fees, interest, and any other monies that may otherwise be awarded to Plaintiff Antonio “Miguel” Ventura if he were to prevail in this action.

This offer of judgment is made for the purposes specified in Federal Rule of Civil Procedure 68 and is not to be construed as either an admission that Defendants are liable in this action, or that Plaintiff has suffered any damages. This Offer of Judgment shall not be filed with the Court unless (a) it is accepted or (b) it is filed in a proceeding to determine costs.

Dated: December 17, 2021  
White Plains, New York

YANKWITT LLP  
By:   
Michael H. Reed  
140 Grand Street, Suite 705  
White Plains, NY 10601  
Tel.: (914) 686-1500  
michael@yankwitt.com  
*Attorneys for Defendants*